

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

WILLIE LEE POOLE,

Plaintiff,

vs.

**AMERICAN INTERNATIONAL GROUP,
INC.; AMERICAN GENERAL
CORPORATION; AMERICAN GENERAL
FINANCE, INC.; CREDIT CENTERS, INC.,
D/B/A AMERICAN GENERAL FINANCE,
INC.; MERIT LIFE INSURANCE
COMPANY; YOSEMITE INSURANCE
COMPANY; KATHIE ROWELL; LATANYA
KENNEDY and fictitious defendants "a", "b",
and "c", whether singular or plural, those
other persons, corporations, firms, or other
entities whose wrongful conduct caused the
injuries and damages to the plaintiff, all of
whose true and correct names are unknown to
plaintiffs at this time, but will be substituted by
amendment when ascertained,**

Defendant.

CIVIL ACTION NO.: CV-05-774

**NOTICE OF FILING AFFIDAVITS IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS**

COME NOW Defendants American International Group, Inc. and American General Corporation, and appearing specially to contest personal jurisdiction, hereby submit the Affidavits of Steven M. Dixon and Linda Sanchez in further support of their Motion to Dismiss due to this Court's lack of personal jurisdiction over Defendants American International Group, Inc. and American General Corporation.¹

Respectfully submitted,

¹ In filing this notice, American International Group and American General Corporation do not waive and specifically preserve their defense of failure to state a claim upon which relief can be granted, as well as other defenses pursuant to Rule 12 of the Federal Rules of Civil Procedure.

s/ John Thomas A. Malatesta
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Thomas J. Butler (ASB-7790-T75T)
John Thomas A. Malatesta, III (ASB-4646-O70M)
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Group, Inc. and American General Corporation

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by U. S. Mail, postage prepaid, on this the 30th day of August, 2005:

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s/ John Thomas A. Malatesta
OF COUNSEL